

**Facility Name:**

**Inspection Date:**

**MCAQ Compliance Inspection Checklist – Paint Stripping and Spray Painting (Autobody, Miscellaneous, and Metal Finishing)**

**Industry Overview:** Spray painting is part of many industrial operations, some of the most significant being autobody collision repair, off road equipment painting, fabricated metal products finishing, and electrical and electronic equipment coating. Paint stripping with chemical strippers that include methylene chloride (MeCl) is sometimes part of the initial preparation of objects prior to spray-applied coating refinishing. Inspection of paint stripping and spray painting operations should involve an evaluation of operational work and maintenance practices, in use equipment (such as spray booths and spray guns), and emissions control equipment if it is installed. Review of applicable records required to be maintained onsite must be included in the inspection.

**Pollutants of concern:** HAPs/ TAPs (methylene chloride and the following metals and compounds: Ni, Cd, Pb, Mn, Cr) and VOC. If a Petition for Exemption for 6H has been granted to the facility, 6H requirements for spray-applied coatings operations are not applicable.

Inspection Points	Inspected?		Results and Comments
	Yes	No	
A. General			
1. Has a Petition for Exemption from 6H been granted to the facility?			
2. If exempted, is there any evidence (MSDS, container labels, etc.) that the spray-applied coatings contain any metal HAP and compounds (Ni, Cd, Pb, Mn, Cr)?			
B. VE Observation			
Are there any visible emissions from the stack(s)?			
C. VOC Work Practices			
1. Are the following procedures in practices: <ul style="list-style-type: none"><li>• store all material, including waste material, containing volatile organic compounds in containers covered with a tightly fitting lid that is free of cracks, holes, or other defects, when not in use,</li><li>• clean up spills as soon as possible following proper safety procedures,</li><li>• store wipe rags in closed containers,</li><li>• does not clean sponges, fabric, wood, paper products, and other absorbent materials,</li><li>• drain solvents used to clean supply lines and other coating equipment into closable containers and close containers immediately after each use,</li><li>• clean mixing, blending, and manufacturing vats and containers by adding cleaning solvent, closing the vat or container before agitating the cleaning solvent. The spent cleaning solvent shall then be poured into a closed container.</li></ul>			

2. When cleaning parts: <ul style="list-style-type: none"> <li>Are items flushed in the freeboard area?</li> <li>Are precautions taken to reduce solvent pooling?</li> <li>Are parts properly drained and dried?</li> <li>Are cleaning machines filled above the fill line?</li> <li>Are solvents agitated to the point of causing splashing?</li> </ul>			
3. Are there any processes or equipment on site that are not listed on the permit?			
<b>D. 6H Requirements: Paint Stripping</b>			
1. Does the facility use a paint stripper which has MeCl? (If no, skip to Section E)			
2. If MeCl paint strippers are used, are procedures in place to reduce or minimize emissions to air, keep use temperature as low as possible, and to store and dispose of strippers properly?			
3. For paint strippers containing MeCl, what is the annual usage? For >1 ton/year MeCl usage: <ul style="list-style-type: none"> <li>Has the facility developed and implemented a MeCl minimization plan? Was it submitted to MCAQ?</li> <li>Is the placard or sign with MeCl minimization practices posted in each use area?</li> </ul>			
<b>E. 6H Requirements: Paintbooth and Painter Requirements</b>			
1. Is the facility coating complete motor vehicles or mobile equipment in an enclosed paint booth while operating a positive pressure of 0.05"W.C. or less? Do the prep stations have the same controls?			
2. Is the facility coating miscellaneous parts and products or vehicle assembly lines in a paint booth with at least three complete walls or complete side curtains so that air is being drawn into the booth? Do the prep stations have the same controls?			
3. Is the facility using a mobile enclosure which prevents overspray? Do the prep stations have the same controls?			
4. All paint booths must have filter which achieves at least 98% capture efficiency. Do the filters fit properly to ensure the capture of overspray? Review documentation of efficiency.			
5. For spray guns with greater than a 3oz capacity, are paint guns HVLP, electrostatic, airless spray gun, air-assisted airless spray gun, or equivalent? Review documentation of rating or equivalency.			

6. Is spray gun cleaning performed without spray mist or solvent atomization outside of a container?			
<b>F. Additional Records Review</b>			
1. Does the facility have a list of personnel by name and job titles who are required to be trained which is current and up to date?			
2. Are the required training certifications for painters available on site with initial date and most recent refresher training date? Refresher training required every five years.			
3. Is training provided in-house or by vendor? Does training include hands on training of spray gun operation and cleaning and paint booth maintenance?			
4. Have there been any deviations from operating procedures for paint stripping, painter, or paint booth operations as previously outlined? If so, does the facility have a deviation report?			

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Name / Date